

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JONATHAN HARRIS,

Plaintiff,

-against-

CITY OF NEW YORK; Detective BRIAN TAYLOR,
Shield No. 4438; Police Officer NEIL MAGLIANO, Shield
No. 2766; Police Officer SEAN NOCE, Shield No. 31328;
Detective JUSTIN PARRIS, Shield No. 22965; Sergeant
WESLEY FRADERA, Shield No. 4246,

Defendants.
----- X

**DEFENDANTS' RESPONSE
TO PLAINTIFF'S
STATEMENT PURSUANT
TO LOCAL RULE 56.1**

15 CV 8456 (CM)

Pursuant to Local Rule 56.1 of the Civil Rules of this Court, defendants City of New York, Detective Brian Taylor, Detective Neil Magliano, Sergeant Sean Noce, Detective Justin Parris and Sergeant Wesley Fradera, submit this counter statement pursuant to Rule 56.1 of the Local Rules of the United States District Court for the Southern District of New York in response to Plaintiff's Rule 56.1 Statement dated September 13, 2017:

1. The extent and nature of the involvement of the individual defendants.

Disputed. Plaintiff cites to no admissible evidence in support of this alleged disputed fact. Defendants Taylor, Noce, Parris and Fradera had no personal involvement in plaintiff's arrest. See, Defendants' Statement of Undisputed Facts Pursuant to Local Rule 56.1 dated August 30, 2017 (Defs' 56.1) at ¶¶ 7, 12, 15-17.

2. Whether plaintiff was observed in possession of the jacket.

Disputed. Plaintiff cites to no admissible evidence in support of this alleged disputed fact. Defendant Magliano observed plaintiff drop a jacket to the ground. Defs' 56.1 at ¶ 7.

Dated: April 17, 2017
New York, New York

ZACHARY W. CARTER
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Noce, Parris and Fradera*
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By: 

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK
JONATHAN HARRIS , Plaintiff, against- CITY OF NEW YORK; Detective BRIAN TAYLOR, Shield No. 4438; Police Officer NEIL MAGLIANO, Shield No. 2766; Police Officer SEAN NOCE, Shield No. 31328; Detective JUSTIN PARRIS, Shield No. 22965; Sergeant WESLEY FRADERA, Shield No. 4246, Defendants.
DEFENDANTS' RESPONSE TO PLAINTIFF'S STATEMENT PURSUANT TO LOCAL RULE 56.1
<i>ZACHARY W. CARTER</i> Corporation Counsel of the City of New York <i>Attorney for Defendants City, Taylor, Magliano, Noce, Parris and Fradera</i> 100 Church Street, Room 3-218 New York, New York 10007 <i>Of Counsel: Paul H. Johnson</i> <i>Tel: (212) 356-2656</i>
<i>Due and timely service is hereby admitted. New York, New York , 2015 . . .</i> <i>Esq.</i> <i>Attorney for</i>